

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

WILANIS COTTO TORRES

DEBTOR

CASE NO. 19-05921/ESL

CHAPTER 13

**DEBTOR'S MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE OF FUNDS FROM 2021 TAX REFUND**

TO THE HONORABLE COURT:

NOW COMES, WILANIS COTTO TORRES, Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Debtor's confirmed *Chapter 13 Plan* dated December 3, 2019, Docket No. 14, provides that the Debtor's tax refunds will be paid into the Plan, in the above captioned case.

2. The Debtor received the 2021 tax refund (\$2,035.00). Attached is copy of bank e-statement, which reflects the direct deposit of the 2021 tax refund to the Debtor's bank account on May 2, 2022, issued by the Puerto Rico Treasury Department.

3. The Debtor respectfully submits to the Court that in May, 2022 she gave birth to her son and the Debtor needs to use these funds to pay for: baby room furniture expenses. Attached is copy of estimate/invoice.

4. The Debtor needs to use the funds from the 2021 "tax refund" to pay for this reasonable expense. Furthermore, the Debtor is living within a very "tight" budget which barely covers his living expenses and a Plan payment of \$214.00.

5. Based on the above-stated, the Debtor respectfully requests this Court to Order the authorization of the use of these funds for this expense.

WHEREFORE, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2021 tax refund by the Debtor in the above captioned case.


NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Debtor Wilanis Cotto Torres, to the address of record: Urb Los Pinos, Buzon 16, Cidra PR 00739.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 31st day of August, 2022.

/s/Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC 203614
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 Ocultar resumen del pedido ^

\$2,006.99



Colección Chayanne

Cuna Convertible, Gavetero y
FREE MATTRES


\$1,799.99

Código de descuento



Subtotal

\$1,799.99

Envíos 

Calculado en el siguiente
paso

Impuestos (estimación)

\$207.00

Total

USD **\$2,006.99**

05/02/2022 DEPT DE HACIENDA REINTEGROS

\$2,035.00

05/02/2022 ATH WITHDRAWAL PUMA LA SIERR

\$20.00

CAGUAS PR ON 04/30/22